

EXHIBIT A

Re: Martin v HL et al., [1:24-cv-72]

Britt Martin <bmartin0211@outlook.com>

Wed 3/20/2024 11:26 AM

To: Burk, Tyler A. <burkt@butzel.com>

Hi Tyler,

Following up on this as we would likely need to get any sort of stip filed with the court as soon as possible.

Brittany E. Martin

From: Burk, Tyler A. <burkt@butzel.com>

Sent: Friday, March 15, 2024 4:29:41 PM

To: Britt Martin <bmartin0211@outlook.com>

Subject: RE: Martin v HL et al., [1:24-cv-72]

Brittany:

I am just getting back into town, but we will discuss this with our clients and get back with you early next week.

Thanks.

Tyler A. Burk

Associate

burkt@butzel.com

Direct: [\(616\) 752-7213](tel:6167527213) | Mobile: [\(989\) 430-5729](tel:9894305729)



Main: 616.988.5600 | Fax: 616.988.5606

300 Ottawa Ave. NW, Suite 620 | Grand Rapids, MI 49503



From: Britt Martin <bmartin0211@outlook.com>

Sent: Thursday, March 14, 2024 5:06 AM

To: Burk, Tyler A. <burkt@butzel.com>

Subject: [EXTERNAL] Re: Martin v HL et al., [1:24-cv-72]

Tyler,

No worries – here are my thoughts:

As we previously discussed, I need to amend my complaint to refine my factual allegations and adjust my claims for a more coherent pleading. I also need to add Bill Henn and Andrew Cascini

as defendants. Recently, I've realized that these modifications will also include the withdrawal of some of my initial claims.

After our last stipulation, I began to reconsider proceeding with amending my complaint on February 29 versus waiting to utilize my right to amend as a matter of course within 21 days of your clients' anticipated motion to dismiss – ultimately deciding on the latter.

While I recognize the strategic value of waiting to amend my complaint until after receiving your clients' response, I acknowledge the benefits of preemptively amending it in that it would spare your clients and the court the effort of responding to and addressing issues that I intend to modify or withdraw. This approach seems more efficient and beneficial for all parties involved.

Nevertheless, preserving my statutory right to amend my complaint as a matter of course following your clients' motion to dismiss remains a priority.

With these factors in mind, I'm reaching out to discuss the possibility of entering into a stipulated agreement that would allow me to proceed with an amendment without forfeiting my statutory right to amend the complaint later, should it become necessary after your clients' motion to dismiss is filed. We can address specific timelines and due dates when we connect on Friday.

I appreciate your understanding and patience in navigating all of this.

Brittany E. Martin

E: bmartin0211@outlook.com

P: (616) 822-9423

From: Burk, Tyler A. <burkt@butzel.com>
Sent: Wednesday, March 13, 2024 5:24 PM
To: Britt Martin <bmartin0211@outlook.com>
Subject: RE: Martin v HL et al., [1:24-cv-72]

Brittany:

I missed your call and tried to give you a call back. Sorry we were not able to connect. I'm out of the office tomorrow, but if you want to send your procedural thoughts here, we can touch base on Friday. Thanks.

Tyler A. Burk

Associate

burkt@butzel.com

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A LexMundi Member

From: Britt Martin <bmartin0211@outlook.com>
Sent: Wednesday, March 13, 2024 3:14 PM
To: Burk, Tyler A. <burkt@butzel.com>
Subject: [EXTERNAL] Martin v HL et al., [1:24-cv-72]

Hi Tyler - I just tried to shoot you a call. Wanted to discuss a couple procedural thoughts I had to see what makes the most sense for everyone. Feel free to shoot me a call whenever.

Thanks,

Brittany E. Martin

616-822-9423

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Martin v Henn Les Amended Complaint

Britt Martin <bmartin0211@outlook.com>

Thu 2/29/2024 7:10 PM

To: Burk, Tyler A. <burkt@butzel.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>

Tyler:

I decided not to amend my original pleading at this time. Obviously I will still agree to the extended deadline for your responsive pleading — despite my decision not to amend my complaint at this time.

I apologize for any inconvenience this may have caused.

Brittany E. Martin

Re: Martin v. Henn Lesperance, PLC et al | 1:24-cv-72

Britt Martin <bmartin0211@outlook.com>

Wed 2/21/2024 3:50 PM

To: Burk, Tyler A. <burkt@butzel.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>

All set.

Brittany E. Martin

From: Burk, Tyler A. <burkt@butzel.com>

Sent: Wednesday, February 21, 2024 3:37:15 PM

To: Britt Martin <bmartin0211@outlook.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>

Subject: RE: Martin v. Henn Lesperance, PLC et al | 1:24-cv-72

Brittany,

As discussed on the phone, we are agreeable to your changes highlighted in yellow, but not the additions in red. We will be sending you a revised version for your review and signature via Adobe sign. Please let me know if you do not receive the updated version.

Thanks.

Tyler A. Burk

Associate

burkt@butzel.com

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From: Britt Martin <bmartin0211@outlook.com>

Sent: Wednesday, February 21, 2024 3:08 PM

To: Burk, Tyler A. <burkt@butzel.com>

Subject: [EXTERNAL] Re: Martin v. Henn Lesperance, PLC et al | 1:24-cv-72

Here are my proposed edits - originally we had said March 21, 2024 would be your responsive pleading but I am agreeable to March 28, 2024, if you would like to extend my deadline out another week until March 7, 2024.

Brittany E. Martin

From: Burk, Tyler A. <burkt@butzel.com>
Sent: Wednesday, February 21, 2024 2:25 PM
To: Britt Martin <bmartin0211@outlook.com>
Cc: Gutierrez, Michael <gutierrez@butzel.com>
Subject: RE: Martin v. Henn Lesperance, PLC et al | 1:24-cv-72

Brittany:

The stipulated order was sent for your review and signature via Adobe Sign. Please let me know if you did not receive it. Thanks.

Tyler A. Burk

Associate

burkt@butzel.com

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A **LexMundi** Member

From: Britt Martin <bmartin0211@outlook.com>
Sent: Wednesday, February 21, 2024 1:58 PM
To: Burk, Tyler A. <burkt@butzel.com>
Cc: Gutierrez, Michael <gutierrez@butzel.com>
Subject: [EXTERNAL] Re: Martin v. Henn Lesperance, PLC et al | 1:24-cv-72

Great, thank you.

I will be adding Bill Henn and Andrew Cascini as individual parties and amending the number of currently unidentified Doe parties from 5 to 25.

Brittany E. Martin

From: Burk, Tyler A. <burkt@butzel.com>
Sent: Wednesday, February 21, 2024 1:50:35 PM
To: Britt Martin <bmartin0211@outlook.com>
Cc: Gutierrez, Michael <gutierrez@butzel.com>
Subject: RE: Martin v. Henn Lesperance, PLC et al | 1:24-cv-72

Brittany,

Yes, we will accept service on behalf of the 4 named defendants. Do you intend to name any other defendants in your amended complaint?

We will be sending you a copy of the stipulated order to extend filing deadlines shortly. If acceptable, please sign and return today.

Thank you.

Tyler A. Burk

Associate

burkt@butzel.com

Direct: [\(616\) 752-7213](tel:616.752.7213) |



Main: 616.988.5600 | Fax: 616.988.5606

300 Ottawa Ave. NW, Suite 620 | Grand Rapids, MI 49503



From: Britt Martin <bmartin0211@outlook.com>
Sent: Wednesday, February 21, 2024 1:23 PM
To: Burk, Tyler A. <burkt@butzel.com>
Cc: Gutierrez, Michael <gutierrez@butzel.com>
Subject: [EXTERNAL] Re: Martin v. Henn Lesperance, PLC et al | 1:24-cv-72

Hi Tyler,

I am glad we were able to touch base and discuss the progress of the case. It was a pleasure speaking with you.

To recap, we discussed your clients' intention to file a motion to dismiss under various provisions of Rule 12(b), including insufficient pleading and the applicability of the statute of limitations.

In line with the local court's rules, I have shared my intention to oppose any such motion. Furthermore, in pursuit of judicial economy and to potentially save both parties' time and resources, I informed you of my imminent plans to file an amended complaint as a matter of course, pursuant to Rule 15.

In our exchange you informed me that Butzel Long represents all defendants in this lawsuit. On this basis, I sought confirmation that serving a single copy of future filings to your office would suffice to effectively serve all defendants, thereby obviating the need for multiple mailings and the associated printing and postage costs. You kindly agreed and indicated you would double check and provide further confirmation post-discussion with your team.

Could you please confirm your agreement with this service arrangement?

Thank you once again for your cooperation and open dialogue. I look forward to your confirmation and any further insights you may wish to share.

Brittany

Brittany E. Martin

From: Burk, Tyler A. <burkt@butzel.com>
Sent: Wednesday, February 21, 2024 9:53:41 AM
To: bmartin0211@outlook.com <bmartin0211@outlook.com>
Cc: Gutierrez, Michael <gutierrez@butzel.com>
Subject: Martin v. Henn Lesperance, PLC et al | 1:24-cv-72

Ms. Martin,

Thanks for your brief time on the phone this morning. As I mentioned, Butzel Long represents the defendants in the above-referenced matter and we intend to file a Motion to Dismiss your Complaint. As required by Local Court Rules, the purpose of my call was to ascertain whether the Motion will be opposed.

You indicated that you would be giving me a call back today to discuss. My direct line is below.

Thank you.

Tyler A. Burk

Associate

burkt@butzel.com

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